

MARK D. LITVACK (No. 183652)  
JEFFREY D. WEXLER (No. 132256)  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
725 South Figueroa Street, 36<sup>th</sup> Floor  
Los Angeles, CA 90017-5524  
Telephone: (213) 488-7100  
Facsimile: (213) 629-1033  
Email: mark.litvack@pillsburylaw.com  
Email: jeffrey.wexler@pillsburylaw.com

Attorneys for Plaintiff and Counterclaim Defendant  
THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY  
and Counterclaim Defendant LI NANYANG

JEFFREY E. FAUCETTE (No. 193066)  
SKAGGS FAUCETTE LLP  
Four Embarcadero Center, Suite 1400  
San Francisco, CA 94111  
Telephone: (415) 295-1197  
Facsimile: (888) 980-6547  
Email: jeff@skaggsfaucette.com

Attorneys for Defendant and Counterclaim  
Plaintiff ZHANG YUZHEN

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

vs.

ZHANG YUZHEN, an individual; FAN MIAO,  
an individual; FAN MAO, an individual; and all  
persons unknown, claiming any legal or  
equitable right, title, estate, lien, or interest in the  
property described in the complaint adverse to  
plaintiff's title, or any cloud upon plaintiff's title  
thereto,

Defendants.

Case No. 4:19-cv-02904-JST

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING CASE  
DEADLINES**

Judge: Jon S. Tigar

Date: October 24, 2023

Time: 2:00 p.m.

Courtroom: 6 (by video)

WHEREAS, on October 24, 2023, the Court entered an Amended Scheduling Order [Dkt. 130];

WHEREAS, the Amended Scheduling Order sets a deadline of March 15, 2024 for fact discovery;

WHEREAS, the parties have met and conferred regarding the scheduling of depositions and have determined that additional time is needed to complete depositions in the case; and

WHEREAS, the parties believe that the discovery cut-off and expert witness deadlines may be amended without requiring any change to the deadlines affecting the Court;

THEREFORE, it is hereby stipulated and agreed by the parties that the Amended Scheduling Order be amended as follows:

Event	Current Date	Proposed Date
Fact discovery cut-off	March 15, 2024	March 29, 2024
Expert disclosures	March 22, 2024	April 5, 2024
Expert Rebuttal	April 19, 2024	April 26, 2024
Expert discovery cut-off	May 17, 2024	May 30, 2024

All other deadlines shall remain the same as in the existing Amended Scheduling Order.  
**IT IS SO STIPULATED.**

Dated: January 23, 2024

MARK D. LITVACK  
JEFFREY D. WEXLER  
PILLSBURY WINTHROP SHAW  
PITTMAN LLP

By: /s/ Mark D. Litvack  
MARK D. LITVACK

Attorneys for Plaintiff and Counterclaim  
Defendant THE BOARD OF TRUSTEES  
OF THE LELAND STANFORD JUNIOR  
UNIVERSITY and Counterclaim  
Defendant LI NANYANG

By: /s/ Jeffrey E. Faucette  
JEFFREY E. FAUCETTE

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

/s/ Jeffrey Faucette  
Jeffrey Faucette

**[PROPOSED] ORDER**

Event	Date
Fact discovery cut-off	March 29, 2024
Expert disclosures	April 5, 2024
Expert Rebuttal	April 26, 2024
Expert discovery cut-off	May 30, 2024

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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